

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
) CRIMINAL NO. 04-10288-RWZ
 v.)
)
 CARLOS ESPINOLA, ET AL.,)
 Defendants)
)

Government's Supplemental Exhibit List

The United States of America, by Michael J. Sullivan, United States Attorney, and Michael J. Pelgro and David G. Tobin, Assistant U.S. Attorneys, hereby gives notice that it may introduce at the trial of the above-captioned action the items listed below.

In its exhibit list and revised exhibit list previously filed with the Court, the government stated that it intended to introduce telephone records. The government now wishes to make clear that such records include data collected from pen register devices installed on telephones associated with defendants Carlos Espinola, Joseph Baldassano, and Matthew Cream, as well as charts summarizing the voluminous data. The data itself, and any reports relating to the data, were previously provided to counsel for the defendants during discovery.

The government also intends to introduce the written plea agreement with defendant Joseph Baldassano. The agreement itself was previously provided to counsel for the defendants during

discovery but it was inadvertently omitted from the government's exhibit list.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By: /s/Michael J. Pelgro
Michael J. Pelgro
David G. Tobin
Assistant U.S. Attorneys

DATED: May 7, 2006.

Certificate of Service

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and that a paper copy will be sent to those indicated as non-registered participants on May 7, 2006.

/s/Michael J. Pelgro
Michael J. Pelgro
Assistant U.S. Attorney